

**SEALED**

## UNITED STATES DISTRICT COURT

MAY 31 2016

for the

Western District of Virginia

JULIA C. DUDLEY, CLERK  
BY: *K. Dotson*  
DEPUTY CLERK

United States of America )  
 v. )  
 Deborah Beth Ryba )  
 )  
 )  
 )  
 )  
 )

Case No. 5:16-cr-00013

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 2014-October 2015 in the county of Rockingham in the  
Western District of Virginia, the defendant(s) violated:

Code Section	Offense Description
21 USC Section 846	Conspiracy to distribute a controlled substance, to wit, alpha- Pyrrolidinovalerophenone(a-PVP)

This criminal complaint is based on these facts:

See Affidavit in Support of Complaint

 Continued on the attached sheet.

Complainant's signature

Robert E. L. Smith, Special Agent, DEA

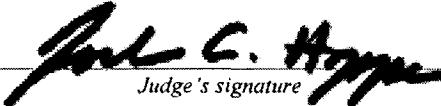
Printed name and title

Received by reliable electronic means  
and sworn and attested to by phone.~~Sworn to before me and signed in my presence~~

Date: May 31, 2016

Charlottesville, VA

City and state: Harrisonburg, VA

Judge's signature

Joel C. Hoppe, United States Magistrate Judge

Printed name and title

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## AFFIDAVIT IN SUPPORT OF COMPLAINTS

I, Robert E. L. Smith (Affiant), a Special Agent with the Drug Enforcement Administration (DEA), United States Department of Justice, being duly sworn, state the following:

1. I am an "investigative or law enforcement officer of the United States" within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516, Title 18, United States Code.
2. I am a Special Agent with the DEA and have been so employed since June 2005. Prior to DEA, I had been employed as a Patrol Agent with the United States Border Patrol since June 2003. During my time with the DEA, I have directed or assisted in investigations concerning criminal violations of Titles 21 and 18 of the United States Code. During my employment I have worked with Special Agents from other Federal Agencies concerning the financial aspects of drug trafficking.
3. Your Affiant submits this affidavit in support of a criminal complaint and a warrant for the arrest of Jason Edward BRADLEY (DOB 04/25/1978) and Deborah Beth RYBA/BRADLEY (hereinafter RYBA)(DOB 03/21/1979) for conspiracy to distribute a controlled substance in violation of Title 21, United States Code, Section 846.
4. This affidavit is being submitted for the limited purpose of securing a complaint and arrest warrant; therefore, this affidavit does not contain every fact that the Affiant has learned during the course of the investigation. The affidavit sets forth only those facts necessary to establish probable cause to believe that BRADLEY and RYBA have violated Title 21 USC 846.
5. The information contained in this affidavit is based upon information provided by cooperating witnesses that was independently corroborated by law enforcement, the Affiant's personal knowledge, review of reports, other law enforcement investigations, a Title III wiretap, email communications of the conspirators, training, experience, as well as the combined training and experience of other law enforcement officers with whom the Affiant has had discussions.

## BACKGROUND OF INVESTIGATION

6. The DEA is investigating Robert SCHROEDER and his co-conspirators for criminal offenses related to controlled substances, controlled substance analogues, money laundering and other criminal conduct. On October 7, 2015, SCHROEDER was arrested pursuant to a federal complaint and arrest warrant from the Western District of Virginia for conspiring with others to distribute a controlled substance analogue, to wit, a-PVP, in violation of Title 21, United States Code, Section 846.

7. Since his arrest, SCHROEDER has participated in multiple interviews with law enforcement, and has provided detailed information related to the conspiracy to import and distribute controlled substance analogs and controlled substances. Much of SCHROEDER's information has been corroborated by other sources of information and therefore is deemed to be reliable and credible. On May 12, 2016, SCHROEDER pled guilty in the Western District of Virginia to an Information that charged violations of 18 U.S.C. § 1956(h) (money laundering conspiracy) and 21 U.S.C. 846 (conspiracy to distribute and possess with intent to distribute analogues of controlled substances and controlled substances).
8. Before he was arrested, in September 2015 and October 2015, SCHROEDER sent two packages containing synthetic cathinones (aka bath salts) in packets labeled "Crystaal Bubbly Hookah Cleaner" to a law enforcement controlled P.O. Box; the packages included a total of 55 packets of "Crystaal Bubbly Hookah Cleaner." DEA laboratory analysis found that the substance inside the "Crystaal Bubbly Hookah Cleaner" packets had a total net weight of 28.8 grams and contained  $\alpha$ -Pyrrolidinovalerophenone (a-PVP), a Schedule I controlled substance since March 2014. During an interview, SCHROEDER later admitted to law enforcement that he sent the synthetic cathinones to locations within the Western District of Virginia and elsewhere. SCHROEDER stated that conspirator DAVID SCHOLZ (now deceased) was the one who typically packaged the synthetic cathinones into the individual "Crystaal Bubbly Hookah Cleaner" packets. The packages came in 1 gram and  $\frac{1}{2}$  gram sizes. SCHROEDER acknowledged that from 2011 to 2015, SCHROEDER, SCHOLZ, conspirator Jason BRADLEY and others conspired with each other, and others, to import synthetic cathinones into the United States from China. These synthetic cathinones were subsequently distributed by them and other conspirators within the United States, including within the Western District of Virginia.
9. SCHROEDER informed law enforcement that in approximately fall of 2014, he and SCHOLZ met with BRADLEY on multiple occasions in the Chicago, Illinois area to discuss obtaining additional synthetic cathinones from China through BRADLEY. SCHROEDER stated that one meeting occurred at BRADLEY's office in Chicago. During this meeting, BRADLEY explained he would have to contact his old interpreter and the old supplier from whom BRADLEY had previously obtained these chemicals to determine what chemicals they could obtain. SCHROEDER stated that at this meeting, BRADLEY, SCHOLZ and SCHROEDER also looked on the Internet at information related to ongoing criminal cases involving bath salts and new synthetic laws. They looked at information related to criminal cases involving their sub-distributor Brian Smith and others.
10. During this investigation, your Affiant also identified BRADLEY's suspected Chinese interpreter and assistant, Sunny CHANG, who law enforcement believes resides and operates in China.

11. During a subsequent meeting in late 2014 between SCHROEDER, SCHOLZ and BRADLEY (at which Deborah RYBA was also present), BRADLEY gave them a list of certain synthetic cathinones that BRADLEY could obtain from his Chinese source; the list included a-PVP, a-PHP, a-BHP. As noted below, law enforcement obtained a list of synthetic drugs from an email account associated with the Chinese interpreter/assistant, Sunny CHANG; this list included a-PVP and a-PHP, and had been emailed between CHANG to BRADLEY around the same time. During this meeting, SCHOLZ had also inquired with BRADLEY about obtaining methylone. BRADLEY said the Chinese supplier did not make methylone, but would get something close to methylone. During the meeting RYBA told BRADLEY, SCHROEDER and SCHOLTZ that they were crazy and to be careful. RYBA had also instructed SCHOLTZ during a meeting not to tell his wife Jasmine Glover that he (SCHOLZ) was there at that meeting. Glover had been trying to keep SCHOLZ away from the synthetic drug business. SCHROEDER stated that, in the end, he and SCHOLTZ placed an order with BRADLEY for five kilograms: two kilograms of a synthetic cathinone of an "alpha" substance and three kilograms of a Methylone-like substance.
12. During this investigation your Affiant obtained search warrants for multiple conspirators' email accounts, including those associated with BRADLEY, RYBA, SCHROEDER, SCHOLZ and CHANG. Your Affiant reviewed CHANG's suspected email account, sunnyerday@gmail.com, as provided by Google Inc. pursuant to a search warrant and found multiple emails between BRADLEY and CHANG, from approximately October 2014 through April 2015, in which BRADLEY and CHANG discussed the purchase, importation and seizure of synthetic cathinones/narcotics, including a-PVP.
13. On October 2, 2014, BRADLEY, using email address jason@guardianimporting.com, sent CHANG an email message at sunnyerday@gmail.com, which said "I need to get some chemicals.. Can you contact the guy and get a current list?" CHANG replied, "What chemicals and quantity?" BRADLEY responded, "...apvp and Methlyone but he had many others. Find out what he can produce because a lot of new chemicals have been made in the last 2 years since we last ordered from him. Find out what he can produce now. The customer wants 5 KG to start out but will decide which chemical once he knows what they can produce and what cost."
14. On October 7, 2014, CHANG sent to BRADLEY's email account an attachment with a list of chemicals that were available from the chemical supplier. CHANG asked BRADLEY to let her know which chemicals he wanted and how he wanted them shipped, and stated that she would get a price quote. On October 8, 2014, BRADLEY emailed the menu of chemicals back to CHANG, and stated "the ones highlighted please get pricing. ... The first order would be for a total of 5kg – I would come to Shanghai to visit you and pick up the order." Your Affiant reviewed the attached list of chemicals and observed that seven chemical names had been highlighted, including "A-PVP powder", "a-PVP big crystal" and "Butylone." CHANG replied back and included the price per kilogram of all seven highlighted chemicals, which included "A-PVP powder USD1080/KG", "A-PVP big crystal USD1320/KG" and "Butylone USD1320/KG."

15. A-PVP and butylone became Schedule I controlled substances in March of 2014.
16. On November 27, 2014, BRADLEY, now using email account [jason@persolvogroup.com](mailto:jason@persolvogroup.com), sent CHANG an email that stated, "We will order soon. Can you please ask him for a total price of 2Kg. APVP crystals AND 3kg Methylone Crystals [if crystal available].. 5kg total. I hope can ship to you so it's safe ahead of my arrival. Im coming to Shanghai specifically to see you – I have no other business in Shanghai this time. I hope I can hire you for as many days as possible while we are there so deby can practice her Mandarin with you and also get clothes made." CHANG replied back on November 29, 2014, "The guy said the Methylone is totally banned in China so no chance to buy that." On December 23, 2014, BRADLEY replied, "please confirm price and available for apvp crystal 2kg and butylone crystal 3kg if no crystal the regular is okay." CHANG replied back, "They have crystal for both and price is USD 1350 per km". CHANG also emailed to BRADLEY bank details for payment as "SHANGHAI PUDONG DEVELOPMENT BANK".
17. SCHROEDER informed law enforcement that BRADLEY charged \$22,000 for this 5 kilogram order. In late 2014, he and SCHOLZ paid BRADLEY approximately \$14,000 in U.S. currency, which represented a partial payment for the order. They would owe BRADLEY the remaining balance of approximately \$8,000 sometime in the future.
18. On January 12, 2015, BRADLEY emailed CHANG, "okay \$6750 sent from USA so it will come over night tonight and should be in his account tomorrow. . . please confirm with man that he can have the products deliver to my hotel Friday as long as money arrives during Tuesday. its Crystal for of [2] apvp and [3] butylone. 5kg total. . . I need the shipments take to HK" (Hong Kong), "dhl AS usual so we need to get them from Shanghai to my normal courier. . . last thing I need you to go to bank of China with me and deby to close our account and take out the money inside the accounts."
19. On January 13, 2015, BRADLEY, using [jason@guardianimporting.com](mailto:jason@guardianimporting.com), forwarded to CHANG an email from Chase Bank and stated "here is the confirmation." The email from Chase Bank had a subject line "Important Business Banking Alert" and the body of the email stated "We've started to process a wire transfer to SHANGAI PUDONG DEVELOPMENT BANK at Shanghai Pudong Development Bank Co., Ltd., in the amount of USD6,770.00 has been debited from your account ending in 5171 on 01/12/2015." Your Affiant reviewed Chase bank account ending in 5171 and found that the account was opened on 07/03/2012 by Jason BRADLEY, it is a business account for RKA Collections LTD DBA Persolvo Group, and uses the address 17 E Monroe St Ste 159, Chicago, IL 60603-5612. The signature card for the account lists Jason E Bradley and Deborah B Ryba with their respective social security numbers. The Chase Bank records for the account ending in 5171 reveal that on 01/12/15 an Online International Wire Transfer occurred and was sent to Shanghai Pudong Development Bank. During the investigation, your Affiant learned that the address on the Chase Bank account is a UPS Store. Based on emails examined during this investigation, both BRADLEY and RYBA have used that address for personal needs, i.e. the billing address for online

purchases.

20. On January 29, 2015, BRADLEY, using email address [jason@persolvogroup.com](mailto:jason@persolvogroup.com), emailed CHANG and stated "please tell the courier to be prepared to take 2 of the 4 boxes to EMS in HK tomorrow morning. I will send the invoice tonight. please again send me the total amount by sending via HK EMS." On January 30, 2015, BRADLEY sent two emails to CHANG with "Commercial Invoices" attached. The first email stated, "You will see the sender info is from factory in HK so its critical it be sent FROM HK or customs in USA will know better". The invoice described the contents of the box as "10 Gel Nail Curing lamps (UV)" and addressed to "Schultz Beauty Supply LLC, 502 Sherman St. Downers Grove, ILLINOIS USA 60515" "ATTENTION: DAVID". The address listed on the invoice was a residence used by David SCHOLZ.
21. During an interview with law enforcement, SCHROEDER stated that in early 2015, SCHOLZ came over to his house with a box from BRADLEY that contained 3 or 4 nail dryer machines. Two of the nail dryers contained approximately 500 grams of bath salts, in each, concealed inside the dryer. The chemicals were inside plastic and mylar bags. On previous occasions, SCHOLTZ and SCHROEDER had received chemicals from BRADLEY smuggled inside of nail dryers, children's toys and stuffed animals. SCHROEDER stated that SCHOLZ took the box and its contents, and later provided SCHROEDER with the bath salts repackaged into the individual "Crystaal Bubbly Hookah Cleaner" packets, which SCHROEDER subsequently distributed to the Western District of Virginia and elsewhere.
22. The second email from BRADLEY ([jason@persolvogroup.com](mailto:jason@persolvogroup.com)) to CHANG ([sunnyerday@gmail.com](mailto:sunnyerday@gmail.com)) had a commercial invoice attached that described the contents of the box as "1 Fingernail Art Lamp" and "5 Nylon Makeup bag (5 colors)", and said the package should be addressed to "Chicagoland Powerhouse Wholesalers at 1042 Maple Ave #189 Lisle ILLINOIS USA 60532". During an interview with law enforcement, SCHROEDER stated that he (SCHROEDER) had created the name "Chicagoland Powerhouse Wholesalers" as a fictitious company so SCHROEDER could receive chemicals by mail. SCHROEDER also said he had provided that name and address to SCHOLZ to provide to BRADLEY for the chemical shipments mentioned above.
23. In 2016, law enforcement obtained a search warrant for Jasmine Glover's Facebook messages; Glover was married to SCHOLZ. During a review of the messages provided by Facebook Inc., your Affiant found communications between RYBA and Glover about the synthetic purchase outlined above. On January 14, 2015, there was a message from Glover's account to RYBA's account that read, "Hey its Dave, can you have Jason call me or Bob at 6307689331" and a reply of, "Im in china now..Ill call you when I get back!" The phone number 630-768-9331 has been identified as the phone number used by SCHROEDER.

24. On May 24, 2015, RYBA sent Glover a message that said "Hey. Please tell ur hubs he needs to return the money he borrowed from me and jason. We need it and this has be drawn outlong enough." As noted above, BRADLEY had agreed to accept partial payment for the chemicals from SCHOLZ and SCHROEDER.
25. On June 7, 2015, RYBA sent Glover additional messages that said, "If your husband doesn't sent my husband the money he borrowed from him, my husband is going to be pissed...So tell him to send it today please. He got the stuff he ordered, and now it's time to pay up. A while ago was the time to pay up." "Jason's called him like 50 times!!! He keeps saying he will send the money.. And then doesn't.....Now it's ridiculous.. And me and u have to be in the middle... But he seriously just need to send the money like he said he would a few weeks ago!"
26. On June 8, 2015, Glover sent RYBA the message, "I am not in the middle of anything." RYBA sent a reply to Glover which said, "well since he has avoided calls and texts for 2 weeks this is only way i know to get messages to him. which is ridiculous - I know! but in case you dont know whats up....he came to us asking for help so he could make some money since he spent so much on lawyers. Jason tried to talk him out of it and spent a few hours showing him and his friend online why.. he asked Jason to loan him money to help him out but he wasnt going to do it but I told him to help him out. we went through a lot of shit and jason has spent tons of time dealing with this before he ever even asked dave to pay us back what we loaned. He have not even asked for a dime of profit yet for all the time and the work done but dave hasnt even repaid what he borrowed and right now we are out a lot of money. Money that we need as most of ours is tied up in the business. I NEVER thought he would pull this on family or I wouldnt have told jason to loan him money. its not just the fact that he hasnt paid us back let alone paid us for all the time and work like he agreed....but he lied to us and now has avoided phone calls and texts for about 2 weeks."
27. On July 9, 2015, RYBA sent Glover a message that stated, "whats a good number for Dave? Please let me know how to reach him and let him know we are coming past downers grove on the way to my dads this coming Saturday before headed to airport to go back to Thailand for the rest of the year THIS SUNDAY Morning and I need to get the rest of our money LATEST this Saturday. I know he's busy with work so he can just let me know where and I can go where ever he needs me to meet him to get our money in the next 3 days. If he's working near downtown thursday or Friday we are staying in River North and headed to Sugar grove late morning on Saturday. Hopefully ill get to see you for a at least a minute too before we go back!"

Based on the aforementioned facts, your Affiant believes that probable cause exists that from approximately September 2014 to October 2015, Jason BRADLEY and Deborah RYBA conspired with Robert SCHROEDER, David SCHOLZ, each other, and others to distribute controlled substance, to wit: a-PVP, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 846.

I declare under penalty of perjury the foregoing to be true and correct to the best of my knowledge and belief.



Special Agent  
Drug Enforcement Administration

Received by reliable electronic means and sworn and attested to by phone on May 31, 2016.

~~Sworn to and subscribed before  
me this~~ ~~xxxxxxxxxxxxxx~~ day of ~~xxxx~~ 2016

  
HONORABLE JOEL HOPPE  
UNITED STATES MAGISTRATE JUDGE  
United States Magistrate Judge